

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

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CLERK U.S. DIST. COURT
WEST. DIST. OF MO
KANSAS CITY, MO

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND SALVA, SR.,

Defendant.

Case No. 12-00354-01-CR

**DEFENDANT RAYMOND SALVA'S MOTION
FOR EARLY TERMINATION OF PROBATION**

COMES NOW Defendant Raymond Salva, Sr., *pro se*, and submits the instant motion for an order terminating his sentence of probation. The following matters are brought to this Court's attention in support of this motion:

1. Defendant Raymond Salva, Sr. (hereinafter "Salva") was a defendant in a theft of government money case. He appeared before U.S. Magistrate Judge Sarah W. Hays on November 29, 2012.
2. Salva entered a guilty plea on June 26, 2013 and was sentenced on April 23, 2014.
3. This Court sentenced Salva to a five year term of probation. Prior to sentencing, Salva satisfied and paid in full, Court-ordered restitution in the amount of \$58,816.00.
4. Salva has served 4/5ths of his sentence. During that time, the government has not alleged, nor has Salva been involved in any incidents of non-compliance with the terms of probation since sentencing. Further, Salva has not appeared before this Court or any other criminal court for any reason since sentencing.

5. Salva entered sentencing at the age of 67 years with a U.S.S.G. criminal history score of "0." He had never been in jail or prison and had no prior convictions. Salva will be 71 in August 2018.

6. The Court permitted Salva to remain in the community without bond during the pendency of his case.

7. Salva has complied with all conditions set forth by this Court and the Probation Office. The Probation Office had no cause to contact the Court regarding Salva's conduct before or after his probationary sentence. In fact, while on probation, Salva was granted permission to travel out of the District on several occasions, for business and personal reasons without incident or problem.

8. Salva is married to his wife Donna. They are celebrating their 50th wedding anniversary in October 2018 and desire to travel with their family for the celebration.

9. Salva has three adult children and eight grandchildren. He maintains strong relationships with his children and grandchildren. All are frequent guests at his home in Sugar Creek, Missouri and his cabin at the Lake of the Ozarks.

10. Salva has always been a highly motivated individual. Even at age 71, he works part-time at a local manufacturing plant and volunteers his skills as a master electrician to assist his friends and neighbors with electrical problems.

11. It appears highly unlikely that the Court will have occasion to see Salva again. His pre-case conduct, as well as his exemplary conduct since charges were filed against him in 2012, strongly suggest that the events giving rise to the above captioned case were a regrettable anomaly.

12. Salva's attention to his family commitments, employment, and nearly six year record of non-criminal conduct establish his ability to function as a law abiding member of society.

13. Given Salva's track record, there is nothing to be gained by continuing his probation. Salva has proven that he has learned his lesson and is no longer in need of supervision.

WHEREFORE, Defendant Raymond Salva, Sr. respectfully requests that an Order be entered terminating his probation and discharging him from federal supervision.

Respectfully submitted,

Raymond E. Salva Sr.

Raymond E. Salva, Sr.

11422 Park Street

Sugar Creek, Missouri 64054

Defendant Pre Se

CERTIFICATE OF SERVICE

I hereby certify that on the 3 day of August 2018, I hand delivered copies of the foregoing to the following:

United States Attorney's Office
400 East 9th Street, Suite 5510
Kansas City, Missouri 64106
816-426-4219

Jana Campbell
Probation Services Technician
U.S. Probation and Pretrial Services Office
Western District of Missouri - Kansas City
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Kansas City, Missouri 64106
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Raymond E. Salvo Sr.

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